

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JILLYN PETERSON, GABE HARE,
ROBERT HEYNEN and ADAM
KRAJEWSKI, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

INSURANCE SERVICES OFFICE, INC.,
THE PLAN ADMINISTRATION
COMMITTEE OF INSURANCE
SERVICES OFFICE, INC., THE TRUSTS
INVESTMENT COMMITTEE OF
INSURANCE SERVICES OFFICE, INC.,
and JOHN DOES 1-30.

Defendants.

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) Civil Action No. 2:20-cv-13223-EP-AME
)
) Honorable Evelyn Padin
) United States District Judge
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) Honorable André M. Espinosa
) United States Magistrate Judge
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) CLASS ACTION
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**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES AND PLAINTIFFS'
CASE CONTRIBUTION AWARDS**

Named Plaintiffs Jillyn Peterson, Gabe Hare, Robert Heynen and Adam Krajewski (collectively “Plaintiffs”), participants in the ISO 401(k) Savings and Employee Stock Ownership Plan (the “Plan”), respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys' fees in the amount of amount of \$1,333,200.00, which represents approximately 33 1/3% of the settlement amount;
2. Directing reimbursement to Class Counsel in the amount of \$73,079.50 of expenses incurred in the prosecution of the action;
3. Awarding a case contribution award of \$10,000 to each of the Named Plaintiffs (Jillyn Peterson, Gabe Hare, Robert Heynen and Adam Krajewski); and
4. For such other relief as the Court may deem just and proper.

A proposed form of Order is submitted hereto. The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

A. Memorandum of Law In Support of Plaintiffs' Motion for Award of Attorneys' Fees and Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs;

B. Declaration of Mark K. Gyandoh In Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Plaintiffs' Case Contribution Awards;

C. Declaration of Plaintiff Jillian Peterson In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Plaintiffs' Case Contribution Awards;

D. Declaration of Plaintiff Gabe Hare In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Plaintiffs' Case Contribution Awards;

E. Declaration of Plaintiff Robert Heynen In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Plaintiffs' Case Contribution Awards; and

F. Declaration of Plaintiff Adam Krajewski In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Plaintiffs' Case Contribution Awards.

Dated: April 8, 2024

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh
Mark K. Gyandoh, Esquire
312 Old Lancaster Road
Merion Station, PA 19066
Tel: (610) 890-0200
Fax (717) 233-4103
Email: markg@capozziadler.com

Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2024 a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Mark K. Gyandoh
Mark K. Gyandoh